

EXHIBIT A

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION

ROSY GIRON DE REYES, *et al.*,

Plaintiffs,

v.

WAPLES MOBILE HOME PARK
LIMITED PARTNERSHIP, *et al.*,

Defendants.

Civil No.: 1:16cv563-TSE-TCB

DEFENDANTS' WITNESS LIST

Defendants Waples Mobile Home Park Limited Partnership, Waples Project Limited Partnership, and A. J. Dwoskin & Associates, Inc., by counsel and in accordance with Fed. R. Civ. P. 26(a)(3)(A)(i) and this Court's December 7, 2016 Order (Dkt. 125), submit their list of witnesses¹ as follows:

Defendants expect to call the following witnesses:

1. Albert J. Dwoskin*
2. Josephine Giambanco
3. Carolina Easton
4. Peter Williams*
5. Mark Jones
6. Daniel H. Weinberg
7. George C. Caruso
8. Valerie Dixon
9. Rosy Giron de Reyes*

¹ An asterisk next to any witness' name indicates that, pursuant to Fed. R. Civ. P. 26(a)(3)(A)(i), the witness will be called only in the event he or she is needed.

10. Jose Dagoberto Reyes*
11. Felix Alexis Bolanos*
12. Ruth Rivas*
13. Yovana Jaldin Solis*
14. Esteban Ruben Moya Yrapura*
15. Rosa Elena Amaya*
16. Herbert David Saravia Cruz*

In addition to the persons listed above, Defendants reserve the right to call as a witness any person identified on Plaintiffs' Witness List and not objected to by Defendants, and to call such additional witnesses for the purposes of impeachment or rebuttal as the Defendants deem appropriate.

Respectfully submitted,

WAPLES MOBILE HOME PARK LIMITED
PARTNERSHIP, WAPLES PROJECT LIMITED
PARTNERSHIP AND
A. J. DWOSKIN & ASSOCIATES, INC.

/s/

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CERTIFICATE OF SERVICE

I hereby certify that on the 2nd day of February, 2017, I caused the foregoing to be filed electronically with the Clerk of the Court using CM/ECF, which will then send a notification of such filing to all counsel of record.

/s/

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